

TRULINCS 16800050 - ORDONEZ, ALEJANDRO - Unit: OAK-A-B

---

FROM: Paez, Alexandra  
TO: 16800050  
SUBJECT: Telefono y payne  
DATE: 05/12/2018 10:51:15 PM

No tenia bateria en mi celular pero el numero que me dio camilo suena apagado le envie un mensaje escrito.  
Y esta es la respuesta de Payne

Mr. Payne sent me a note for Mr. Borda yesterday. I have finally had a chance to answer my accumulated e-mail and have converted his note into the following response to the question posed by you and Mr. Borda.

"Mr. Borda received our informational which clearly provides that no refunds are given. We currently have 2 researchers looking into caselaw as to the jurisdictional question. and also the requirements for a transfer. It is our standard practice to let ALL clients know that research takes 6 months to a year. Mr. Payne talked to Giraldo twice now and we agreed to talk regularly. Giraldo stated to staff that he had not negotiated a specific task list. You have now breached your agreement with our research firm. You can hire Giraldo or any other research firm you wish. However, your refusal to further cooperate in the gathering of caselaw supportive of your position constitutes a breach of the agreement between yourself and Timberwolf. This work is not easy. It is complex and time consuming. Above all, it requires patience and cooperation. You evidently do not have the necessary patience for this undertaking. Firing Timberwolf is not the cooperation envisioned in our original agreement."

As one of the researchers mentioned above, I would like to point out yet again that I get my instructions from Mr. Payne and Mr. Hartley. They look at my research and then give me further direction. Like every other case, I work Mr. Borda's case as a series of sprints that occur when I get specific requests for research followed by a lull while the lawyer types digest the information I provide and figure out what they want me to do next. In between intense periods of research for one client or another I try to pay the bills and answer the e-mails. I work over 12 hours a day, seven days a week and am far too busy to repeat myself responding to customers who seem to believe that I am going to drop everything to answer their e-mails. I am support staff for a legal services firm. I am not permitted to dash off quick answers. I am expected to carefully consider and consult on the proper response before I send out an email. I may not respond quickly, but I will eventually return your E-mails.

One additional comment, If post conviction work was easy. the prisons would have a lot fewer inmates. By the time they come to us most of our customers have already messed up all of their best chances too go free. We take our time because one must be careful when there are no extra chances left. Impatience at this part of the proceedings is almost guaranteed to ensure a man remains in prison.

When many years of a man's life is on the line, taking our time to carefully consider what we are doing represents the best chance a man has of being successful in his bid to leave prison sooner rather than later.

James Houk, MA  
Head of Research  
Timberwolf

EXH. 1



Timberwolf Litigation &  
Research Services, LLC

Dear Prospective Customer and Family:

Enclosed you will find materials concerning our organization and our work on behalf of inmates nationwide. We provide both attorney referral and assistance and comprehensive analysis and research in support of an inmate's claims. We work closely with family and supporters.

So .... Welcome to Timberwolf. Let's get started.

- The Timberwolf Team

*Timberwolf Provides Attorney Referral and Research Services for Law Firms and Convicted Citizens.*

112 East High Street, Eaton Ohio 45320

260.243.5649 · 855.712.5276

[helpmetimberwolf@googlegroups.com](mailto:helpmetimberwolf@googlegroups.com)

Dennis Hartley – Senior Counsel

"EXH" 21



Timberwolf Litigation &  
Research Services, LLC

## Post Conviction Assistance

Dear Valued Customer,

Timberwolf staff has reviewed your letter inquiries, and has secured experienced counsel who has agreed to accept supervision over the preparation of the paperwork for your post conviction assistance. Please contact our offices (714) 419-2614) and let us know what you and your family can afford for post conviction assistance. This will cover template assistance at the State level and template preparation of Section 2241, 2254, or 2255 Habeas requests at the Federal Level.

Please note that this price does not cover the cost involved in obtaining, printing and shipping documents, and that expenses incurred at the customer's request such as the hiring of investigators, travel for our general counsel or staff, or any other unusual expenses requested and authorized by the client will be billed on a cost plus basis.

This package contains this welcome letter, a copy of our current tri-fold brochure, a Prospective Customer Interview Form, information on sending documents to Timberwolf, information concerning mail and electronic communications with Timberwolf, as well as a list of the documents we will need in order to properly analyze your current situation.

Make your check or money order out to "Dennis Hartley", who will accept your payment on behalf of Timberwolf Litigation and Research Services LLC. Send the payment to the address listed below. Please include the inmate's name in the "memo" section of the check so we can apply the funds to the correct account. You may also arrange a credit card payment by calling (317) 514-9483. As soon as the financial arrangements are completed, the Timberwolf Team will send you additional documents and begin to work on your behalf.

Welcome to Timberwolf.

T.S.

Timberwolf Litigation and Research Services LLC  
112 East High St. Eaton, Ohio 45320  
260.243.5649 · 855.712.5276  
helpmetimberwolf@googlegroups.com

EXH 2. (a)





## Timberwolf Litigation & Research Services, LLC

### **Business Office**

112 E. High St. Eaton OH 45320  
317.514.9483

### **Request for Documents**

We cannot begin to work on your case without the relevant documents. You will need to send us copies of the following documents so that we can familiarize ourselves with your case facts and circumstances:

1. Indictment;
2. All pre-trial motions;
3. All pre-trial court rulings;
4. All discovery materials tendered by the prosecution;
5. All available transcripts (either trial or guilty plea);
6. Pre-sentence report;
7. Sentencing transcript;
8. Any post sentencing filings including petitions, motions, memorandums, or briefs;
9. All post sentencing court opinions;
10. Copies of any relevant E-mails;
11. If this is a civil action against the institution of confinement please send copies of all copouts and administrative remedy paperwork.
12. If this is a medical malpractice claim, send copies of all medical records documenting your illness and treatment.
13. All the administrative paperwork you have filed seeking to have your medical needs addressed.

Please do not send originals. Send only copies. If you do not have copies of these documents then we will send you lawyer release forms so that you can request that your former lawyers send a copy of your file to Timberwolf. Due to lawyer/client confidentiality rules, only you can ask for these files. We cannot do it for you. If all else fails we can order files from the Court but this can get expensive and is not covered in the basic contract.

**If the Court sends you a document,  
Send it to us immediately!!!!!!**

### **Please Return Documents To:**

Timberwolf Litigation and Research Services LLC  
112 East High Street  
Eaton, Ohio 45320

260.243.5649 · 855.712.5276  
[helpmetimberwolf@googlegroups.com](mailto:helpmetimberwolf@googlegroups.com)

EXH 2.(C)



## Timberwolf Litigation & Research Services, LLC

### Instructions for the Lawyer Release Form

Dear client,

Enclosed you will find a Lawyer Release Form. Please send a filled out copy to each of your previous lawyers including any public defenders so that they will know that they have your permission to forward your file to Timberwolf Litigation and Research Services LLC and the Lawyer(s) and staff members assigned to work on your case.

**Do not waste time by sending this letter or any of the Lawyer Release Forms back to Timberwolf. You must send a copy of the Lawyer Release Form to each of your previous Attorneys or Public Defenders. It is your responsibility to contact any previous Attorney or Public Defender and request that they release the files concerning your case to Timberwolf. The request must come from you and not from Timberwolf.**

Once your previous Attorney or Public Defender receives a properly filled out copy of the Lawyer Release Form, he or she will hopefully send your file to Timberwolf. If the previous Attorney or Public Defender sends you any correspondence concerning these files or the files themselves, please mail copies of these files or correspondence to Timberwolf as quickly as possible. If they deny your request and refuse to send the file then we can try to change their minds. But you must first authorize them to release the file or we have no authority to step in.

Receipt of your file from your previous Attorney will enable us at Timberwolf to move forward with your case. Failure to promptly receive these files will mean delays in any assistance we can provide to you. .

Please have the actual files sent to our document processing center at 112 East High Street in Eaton, Ohio to be scanned and made available to the Timberwolf staff working with your case. Do not send these files directly to your assigned lawyer. Sending these files directly to your assigned lawyer will only add delays to Timberwolf's ability to move your case forward.

Sincerely Yours,

Timberwolf Staff

112 East High Street, Eaton Ohio 45320  
260.243.5649 · 855.712.5276  
[helpmetimberwolf@googlegroups.com](mailto:helpmetimberwolf@googlegroups.com)  
Dennis Hartley Senior Counsel

"EXH" 3



**AUTHORIZATION FOR RELEASE OF LEGAL FILES**TO: Eduardo Balarezo400 Seventh Street, NW Suite 306Washington DC 20004

(fill in name and address of your prior law firm or public defender)

You are hereby authorized to release any and all documents, including but not limited to pleadings, correspondence, notes, medical records and reports, investigative reports, and all other information written or otherwise recorded, contained in the file identified or relating to my legal case listed as follows:

CR-Case: 00065 - GK - 1United States District Court District of Columbia

to Timberwolf Litigation and Research Services LLC, 112 East High St., Eaton, Ohio, 45320 or to any representative, attorney or investigator from said firm. I specifically authorize the release to said individuals of information pertaining to confidential attorney-client communications, medical treatment, drug and alcohol abuse and related treatment, and psychological and psychiatric treatment, if such are a part of your records.

THIS AUTHORIZATION HEREBY REVOKES ANY AND ALL PRIOR AUTHORIZATIONS TO RELEASE INFORMATION CONCERNING ME, EXCEPT AUTHORIZATIONS PROVIDED BY LAW. YOU ARE REQUESTED TO DISCLOSE NO INFORMATION TO ANYONE ELSE WITHOUT MY PRIOR WRITTEN AUTHORIZATION.

DATED this 18 day of January

Client Signature

Christian Borda

Client Name (Printed)

U.S. Postal Service™	
<b>CERTIFIED MAIL® RECEIPT</b>	
Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Certified Mail Fee	\$ 3.35
Extra Services & Fees (check box, add fees as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$ 4.49
Total Postage and Fees	\$ 7.84
Sent To	Eduardo Balarezo
Street and Apt. No., or PO Box No.	400 Seventh Street, NW
City, State, ZIP+4®	Washington, DC 20004- Suite 306

7016 3010 0000 7584 9878

11 EXH 3(a)

Postmark Here: BORDA, C  
49303-053  
F. 019 Oakdale  
Vernon II

**AUTHORIZATION FOR RELEASE OF LEGAL FILES**TO: Marcia G Shein2392 N Decatur Rd.Decatur, GA 30033

(fill in name and address of your prior law firm or public defender)

You are hereby authorized to release any and all documents, including but not limited to pleadings, correspondence, notes, medical records and reports, investigative reports, and all other information written or otherwise recorded, contained in the file identified or relating to my legal case listed as follows:

Record Nos: 13-3074(L), 13-3101United States Court of Appeals for the D.C. Circuit

to Timberwolf Litigation and Research Services LLC, 112 East High St., Eaton, Ohio, 45320 or to any representative, attorney or investigator from said firm. I specifically authorize the release to said individuals of information pertaining to confidential attorney-client communications, medical treatment, drug and alcohol abuse and related treatment, and psychological and psychiatric treatment, if such are a part of your records.

THIS AUTHORIZATION HEREBY REVOKES ANY AND ALL PRIOR AUTHORIZATIONS TO RELEASE INFORMATION CONCERNING ME, EXCEPT AUTHORIZATIONS PROVIDED BY LAW. YOU ARE REQUESTED TO DISCLOSE NO INFORMATION TO ANYONE ELSE WITHOUT MY PRIOR WRITTEN AUTHORIZATION.

DATED this 18 day of January


Client Signature

Christian Borda

Client Name (Printed)

EXH 3 (H)

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
OFFICIAL USE	
Certified Mail Fee	3.35
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
Total Postage and Fees	3.84
Sent To	Marcia Shein
Street and Apt. No., or PO Box No.	2392 N Decatur Rd
City, State, ZIP+4®	Decatur, GA 30033

1998 4852 0000 010E 910L

44AN 22 2018

BORDA, C  
44353053  
F.C.I. Oakdale  
VERNON II

## Welcome to Timberwolf

JH

James Houk <jameshouk@timberwolfresearch.com>

Reply |

Tue 11/7/2017 9:44 AM

To: lisaapaez@hotmail.com

Flag for follow up.

You replied on 11/17/2017 12:53 PM.

new Customer E-mail p...

1 MB

Download   Save to OneDrive - Personal

"EXH 4"



Re: Welcome to Timberwolf

SP

Sandra p

Reply |

Fri 11/17/2017 12:53 PM

To: James Houk (jameshouk@timberwolfresearch.com)

Good afternoon Me. Houk. I will beailing all the welcome package tomorrow, but I have a question about payment we haven't received a price bit what ever it is can be paid with a payment plan? or how?

---

**From:** James Houk <jameshouk@timberwolfresearch.com>

**Sent:** Tuesday, November 7, 2017 9:43:48 AM

**To:** lisaapaez@hotmail.com

**Subject:** Welcome to Timberwolf

"EXH 4(a)"

Re: Welcome to Timberwolf

JH James Houk <jameshouk@timberwolfresearch.com> Reply |  
Fri 11/17/2017 1:45 PM  
To: Sandra p (lisaapaez@hotmail.com)

Flag for follow up.

I am not the person who sets prices but I am the person who documents the incoming funds and we have many clients who are on a payment plan. We try to get half down but we have accepted less if we felt confident that the customer had both the intent and the continuing ability to pay. Since inmates get caught up in prison wide lock-downs, go to the hole, get transferred to another prison and other things that disrupt communication, we don't freak out when we lose contact for a month or two. But when someone is seriously behind in their payments we simply stop working on their case until the payments get caught up. If they do not resume payments we do not resume work. We have never used bill collectors or gone to Court over nonpayment but, on the other hand we do not give refunds either so this tends to even out. When we stop work for nonpayment the customer also loses their scheduling priority. If the customer fails to make payments until a week before a document is due before catching up on their payments there is little we can do for them except send a request for an extension of time. We will then fit them back into the schedule as time becomes available. We do not see where a customer's failure to make their payments on time creates an emergency requiring that we set other work aside in order to rush to the rescue.. When we fear that the intent of a client is to avoid paying for the work we have done we may ask for full payment prior to delivery of the finished work. All depends on our interpretation of the facts before us.

Please contact Ken Payne at (719) 419-2614 to discuss price and payment plans.

James Houk, MA  
Head of Research  
Timberwolf

On Fri, Nov 17, 2017 at 2:53 PM, Sandra p <lisaapaez@hotmail.com> wrote:

Good afternoon Me. Houk. I will beailing all the welcome package tomorrow, but I have a question about payment we haven't received a price bit what ever it is can be paid with a payment plan? or how?

---

**From:** James Houk <jameshouk@timberwolfresearch.com>  
**Sent:** Tuesday, November 7, 2017 9:43:48 AM  
**To:** lisaapaez@hotmail.com  
**Subject:** Welcome to Timberwolf

11  
EXH 4(b)



Virtual Terminal -View Receipt

<https://vt.transactionexpress.com/POSTransactions/Transactions/View...>

Timberwolf Litigation  
112 E High St  
EATON, OH, 453200000  
260-243-5649

Date: 12/4/2017 3:23:01 PM PST

Transaction ID: 1696027022

Ref ID:

Purchase Order #:

Card Type: Visa

Account: \*\*\*\*\*9312

Auth: 263702

Amount: \$1600.00

Signature: Lisa PAEZ for Christian Bowden

I cardholder agree to pay the above amount according to the card issuer agreement.  
(Merchant agreement if credit voucher)

Thank You!

EXH 4(c)

Timberwolf Litigation  
112 E High St  
EATON, OH, 453200000  
260-243-5649

Date: 1/10/2018 8:50:16 AM PST  
Transaction ID: 1759327662

Ref ID:  
Purchase Order #:  
Card Type: MasterCard  
Account: \*\*\*\*\*7652  
Auth: 820217  
Amount: \$1000.00

Signature: Lisa Paz for Christian Boudet

I cardholder agree to pay the above amount according to the card issuer agreement.  
(Merchant agreement if credit voucher)

Thank You!

"EXH" 4(2)



Re: Cristian Borda

SP

Sandra p <LisaAPaez@hotmail.com>

Reply |

Mon 12/4/2017 9:33 PM

To: James Houk (jameshouk@timberwolfresearch.com)

Hi, thank you very much, it is Paez. Mr. Borda said if we can make a payment of 2500 in a month from now and payments of 500 monthly until finish paying is that fine?  
Thank you very much

Lisa Paez

On Dec 4, 2017, at 10:30 PM, James Houk <[jameshouk@timberwolfresearch.com](mailto:jameshouk@timberwolfresearch.com)> wrote:

Now I am confused. Should it be Paez or Parz as above?

attached are the transaction slips from the credit card portal.

This totals \$2500 which Ken says is the down payment on \$7500.00.

Ken says that you were going to tell us what kind of payment schedule you can realistically make.

thank you for your confidence

James

On Mon, Dec 4, 2017 at 6:26 PM, Sandra p <[lisaapaez@hotmail.com](mailto:lisaapaez@hotmail.com)> wrote:

Mr. James this is my email address

Lisa Parz

<Borda, Christian downpayment from Lisa Paez.pdf>

"RLH" 5

Re: Christian Borda

SP

Sandra p <LisaAPaez@hotmail.com>

Reply |

Wed 12/13/2017 10:57 AM

To: James Houk (jameshouk@timberwolfresearch.com)

Good afternoon,

About the addresses as soon as I have them I'll email them to you, his ID number is 49353053. Jurisdiction is Washington DC, I'm sorry my number is 3014676545. Thank you

Sandra

On Dec 12, 2017, at 8:35 PM, James Houk <[jameshouk@timberwolfresearch.com](mailto:jameshouk@timberwolfresearch.com)> wrote:

In order to mail documents to you and Christian I need proper mailing addresses for each. I know you have been talking to Ken but I really need some basic information concerning his case including the jurisdiction that convicted him and his current prison ID number. I was given your former phone number (240-907-8886) but I was informed that the number was reassigned. So I really need current contact information.

James Houk, MA  
Head of Research  
Timberwolf

11  
EXH C



Re: corrlinks

SP

Sandra p <LisaAPaez@hotmail.com>

Reply |

Wed 1/3/2018 3:19 PM

To: James Houk (jameshouk@timberwolfresearch.com)

Thanks I'll let him know

Sandra

On Jan 3, 2018, at 11:55 AM, James Houk <[jameshouk@timberwolfresearch.com](mailto:jameshouk@timberwolfresearch.com)> wrote:

In order for Christian to communicate with Timberwolf on Corrlinks or Jpay he must get on the prison email service and essentially ask the prison if he is allowed to communicate with us. The prison provider then sends us a notice of his request and we accept it and send him an introductory message.

The request must start on his end. We cannot start the process from our end. It is the way the system is set up.

I operate the Timberwolf Corrlinks portal. I strip the messages off Corrlinks and direct them through real world email to whoever needs to see them. In doing so I preserve a long term record of these messages as they are only available for a short period of time on corrlinks.

he should use the address [helpmetimberwolf@googlegroups.com](mailto:helpmetimberwolf@googlegroups.com)

James Houk, MA  
Head of Research  
Timberwolf

"EXH" 7

## Kens response

JH James Houk <jameshouk@timberwolfresearch.com> Reply |  
Sat 5/12/2018 2:02 PM  
To: Sandra p (lisaapaez@hotmail.com);  
Ken Payne (krpayne@timberwolfresearch.com)

Mr. Payne sent me a note for Mr. Borda yesterday. I have finally had a chance to answer my accumulated e-mail and have converted his note into the following response to the question posed by you and Mr. Borda.

"Mr. Borda received our informational which clearly provides that no refunds are given. We currently have 2 researchers looking into caselaw as to the jurisdictional question, and also the requirements for a transfer. It is our standard practice to let ALL clients know that research takes 6 months to a year. Mr. Payne talked to Giraldo twice now and we agreed to talk regularly. Giraldo stated to staff that he had not negotiated a specific task list. You have now breached your agreement with our research firm. You can hire Giraldo or any other research firm you wish. However, your refusal to further cooperate in the gathering of caselaw supportive of your position constitutes a breach of the agreement between yourself and Timberwolf. This work is not easy. It is complex and time consuming. Above all, it requires patience and cooperation. You evidently do not have the necessary patience for this undertaking. Firing Timberwolf is not the cooperation envisioned in our original agreement."

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One additional comment, If post conviction work was easy, the prisons would have a lot fewer inmates. By the time they come to us most of our customers have already messed up all of their best chances too go free. We take our time because one must be careful when there are no extra chances left. Impatience at this part of the proceedings is almost guaranteed to ensure a man remains in prison.

When many years of a man's life is on the line, taking our time to carefully consider what we are doing represents the best chance a man has of being successful in his bid to leave prison sooner rather than later.

James Houk, MA  
Head of Research  
Timberwolf

EXH 8

Cristian Borda

SP Sandra p  
Sat 2/10/2018 8:16 AM  
To: jameshouk@timberwolfresearch.com

Reply |

Good Mornin this is Lisa on behalf of Cristian Borda, he would like to know if you are preparing the court appearance? And to see if the Lawyer will prepare the form to sent to Mrs. Shein requesting all the records to he sent to your office.

Thank you very much

Lisa

"EXH" 8(a)



Re: Mr. Borda

JH

James Houk <jameshouk@timberwolfresearch.com>

Reply |

Sat 2/3/2018 1:27 PM

To: Sandra p (lisaapaez@hotmail.com)

Have found the cases despite the fact that PACER does not recognize the number you gave me as valid and sent to Ken.

James

On Fri, Jan 26, 2018 at 1:30 PM, Sandra p <lisaapaez@hotmail.com> wrote:

Hello Mr. Houk

Mr. Borda asked me to sent you this information about a civil case that he has he said it will help with the 2255, this is the case number 14-229(RDM) United States District Court for the District of Columbia.

We will like to know if the affidavits were already mailed to him with the receipts and the contract that he has with Timberwolf? Can you please confirm when you received this message and forward to Mr. Payne please. Thank you very much

Lisa

"EXH" 8(6)

### 3. Mr. Boda to Mr. Payne

SP

Sandra p

Reply |

Fri 5/11/2018 4:04 PM

To: jameshouk@timberwolfresearch.com

I never received an answer from your office I'll let Mr. Borda know thank you very much

Please confirm

Good Morning

I talk to Mr. Borda basically what he was asking from your office was:

That you update Giraldo on what you had done.

That you work with him and he will be helping you with whatever you need (not doing your job)

But yesterday we found out that you had done nothing by asking for Mr. Borda's paper work I knew that you had done nothing

I don't have the date that I sent the files from Mrs. Shein more than a month ago.

Mr. Borda want his money back and he doesn't want you to work for him any more you had more than 4 months.

Thank you very much

Lisa

EXH 8(c)

Re: 3. Mr. Boda to Mr. Payne

JH

James Houk <jameshouk@timberwolfresearch.com>

Reply |

Sat 5/12/2018 12:15 PM

To: Sandra p (lisaapaez@hotmail.com)

Ken spoke to Mr Giraldo (I think it was thursday) and and set a time to talk at the beginning of the week. When I check my emails I handle messages from courts before I handle messages from inmates and their families. If the inmates and their families ask questions that I can answer then I do. If they ask questions that need Ken or Mr. Hartley to answer then I forward the message. I usually do this late at night and on weekends. If Ken and Mr. Hartley do not give me a reasonably rapid response then I cannot promptly generate an email with the answer in it.

Items concerning strategy (including questions about what has been done to date) is not something I am authorized to answer without direction. I am not a lawyer and I cannot make pronouncements on "legal questions." I can say if I am typing something or if I have mailed something but both of these directly relate to my work and my authority and not to the work or authority of others,

I cannot force others to respond to your messages. I can nag - but I have learned that excessive nagging can quickly turn counterproductive and result in less than optimum result.

I got Ken in touch with Mr. Giraldo and I have been told they are handling it. So I really have little to tell you at the present time. But I will most certainly pass your current message on in hopes of a quick answer. I will also nag a bit to get a response.

James Houk  
Head of Research  
Timberwolf

On Fri, May 11, 2018 at 6:04 PM, Sandra p <lisaapaez@hotmail.com> wrote:

I never received an answer from your office I'll let Mr. Borda know thank you very much

Please confirm

Good Morning

I talk to Mr. Borda basically what he was asking from your office was:

That you update Giraldo on what you had done.

That you work with him and he will be helping you with whatever you need (not doing your job)

But yesterday we found out that you had done nothing by asking for Mr. Borda's paper work I knew that you had done nothing

I don't have the date that I sent the files from Mrs. Shein more than a month ago.

Mr. Borda want his money back and he doesn't want you to work for him any more you had more than 4 months.

Thank you very much

Lisa

"EXH" 8(d)



Mr. Boda to Mr. Payne

SP Sandra p  
Wed 5/9/2018 7:36 AM  
To: jameshouk@timberwolfresearch.com

Reply |

Good Morning

I talk to Mr. Borda basically what he was asking from your office was:

That you update Giraldo on what you had done.

That you work with him and he will be helping you with whatever you need (not doing your job)

But yesterday we found out that you had done nothing by asking for Mr. Borda's paper work I knew that you had done nothing

I don't have the date that I sent the files from Mrs. Shein more than a month ago.

Mr. Borda want his money back and he doesn't want you to work for him any more you had more than 4 months.

Thank you very much

Lisa

EXH (e)

Re: Cristian Borda

SP

Sandra p <LisaAPaez@hotmail.com>

Reply |

Sat 5/5/2018 7:13 AM

To: James Houk (jameshouk@timberwolfresearch.com)

Hello,

Friday May 4 I received a call from Mr. Payme asking me for Mr. Giraldo's phone number and I gave the number to him and I sent to you by message and now he is telling me tha he has the wring number..... 2022996975 here is the number

Sandra

On May 3, 2018, at 12:25 PM, James Houk <[jameshouk@timberwolfresearch.com](mailto:jameshouk@timberwolfresearch.com)> wrote:

Mr. Ken is now back in the country and taking all the calls he is behind on.

James

On Wed, May 2, 2018 at 3:47 PM, Sandra p <[lisaapaez@hotmail.com](mailto:lisaapaez@hotmail.com)> wrote:

Hello Mr. Houk

We had tried tontalk to Mr. Payne with no answer the last time I talk to him was when I gage him Mr. Giraldo's phone number he had never answuer him any calls or even tried to call him back. I had talk to Mr. Borda and actually we need an update on his case we are getting tired of the answer that Mr. Payne will be working on his case as soon as he finish the case on top of him, to me it means that he had not work on it at all, can you please tell him to give me a call soon and we need him to talk to Mr. Giraldo is been more than a week waiting for his answer.

Than you very much

Lisa Paez

"EXH" 8 (F)

Cristian Borda

SP Sandra p  
Fri 4/20/2018 9:49 AM  
To: jameshouk@timberwolfresearch.com

Reply |

Hello Mr. Houk

Mr. Cristian Borda just called me telling to let you know that a guy named Rafael Giraldo he is a paralegal will be calling you asking you about his 2255 and your investigations, can you please let Mr. Payne know about it.

Mr. Giraldo has Mr. Borda authorization to ask questions, he is very worry about time running out and he doesn't know anything.

Thank you very much

Lisa

"EXH" 8 (9)



Cristian Borda

SP

Sandra p

Reply |

Wed 3/21/2018 7:11 PM

To: jameshouk@timberwolfresearch.com

Hi, Mr. Houk

This is Lisa on behalf of Mr. Borda I will like to know if you have talk to Mr. Payne he is not answering the phone and second I will like to know if you have received the files from Mr. Balarezo he said that he had sent you a USB with all files?

We would like to know to stop bothering him, thank you in advance.

Lisa

"EXH" 8(15)

Re: Mr. Borda

SP Sandra p <LisaAPaez@hotmail.com>  
Mon 5/14/2018 5:50 PM  
To: James Houk (jameshouk@timberwolfresearch.com)

Reply |

Ok, he will like to know if everything will be ready for the dead line he doesn't know how os everything going and he never new anything about his transfer, we need answers

Sandra

On May 13, 2018, at 8:33 PM, James Houk <jameshouk@timberwolfresearch.com> wrote:

This organization has a set procedure which is followed in every case. This procedure is neither arbitrary nor capricious but has evolved out of our past efforts as a way to ensure a proper review of documents and case materials that may have never been neglected by others. All documents are scanned and digitized as we receive them in the Ohio office. If the client requests we return the materials when scanning is complete. If not we retain the file until the case is completed. This permits us to go back and check what we actually received and when it was received in case something was missed during the scanning process. This procedure helps to ensure that a minimum of mistakes are made in assembling a customer's file.

Raw scans of the incoming mail received in the Eaton Office are e-mailed to the Colorado office in order to provide a heads up of emergent issues and a general feel for what type of case documents are being sent to us by the customers, their families, and the Court. Emergent issues requiring immediate responses are handled at this stage.

Most of the case documents we receive do not require immediate attention in order to comply with a filing date set by the Court. These documents are reviewed by staff and then placed in the customer's file. From there, our research people read everything previously tendered and organize it so that it more easily retrieved. They then make written summaries and recommendations, concerning the cases. These summaries and recommendations are reviewed by our General Counsel and his staff and specific requests for information are made of the research department. The research department tries to answer these research requests in a timely manner. These answers are then reviewed and a new set of research requests are made as a result of the new information. This process may be repeated several times before the presentation of research results to the customer. This back and forth process generally takes 6 months or more but minimizes the risk that an off the cuff filing will shut the door and prevent an inmate from making a more careful filing at a later date.

You asked for research on the topic of institutional transfer requirements. We have pointed out that transfers from one federal prison to another are an internal BOP matter and that an inmate can request a transfer from his counselor who then fills out the paperwork required. We have previously explained that this paperwork cannot be created and filed by an outside party. transfer requests are generally filed by the inmate's councilor in response to an inmate request. We can assist in identifying factors that may be beneficial to the inmate seeking a transfer. hat

You asked for research on the topic of the legitimacy of the jurisdictional basis for your prosecution. Our research staff is currently studying case law that is supportive of your position. As soon as it is completed, we will be able to provide a written report.

"EXH" 8 (i)

Re: Fw: Borda Case File- Part II all included

JH

James Houk <jameshouk@timberwolfresearch.com>

Reply |

Mon 3/5/2018 11:24 PM

To: Sandra p (LisaAPaez@hotmail.com)

You replied on 3/6/2018 10:01 AM.

Have downloaded part II files

On Mon, Mar 5, 2018 at 10:53 PM, Sandra p <[LisaAPaez@hotmail.com](mailto:LisaAPaez@hotmail.com)> wrote:

please confirm

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EXH 9